

**DEBORAH BROWN, on behalf of herself
and on behalf of all others similarly situated,**

Plaintiff,

v.

ALLY FINANCIAL, INC.

Defendant.

v.

ALLY FINANCIAL, INC.

Defendant.

Plaintiff and Defendant hereby move this Court for an extension of time to file Motion for Preliminary Approval of Class Action Settlement. In support of this Motion, the parties state as follows:

1. On July 23, 2015, the Court ordered the parties to file the Motion for Preliminary Approval of Class Action Settlement on or before August 27, 2015 (Doc. #50).
2. On August 28, 2015, the Court granted the parties' joint motion for extension of time to file the Motion for Preliminary Approval of Class Action Settlement, and ordered that filing on or before September 17, 2015 (Doc. #52).
3. On September 21, the Court granted the parties' (second) joint motion for extension of time to file the Motion for Preliminary Approval of Class Action Settlement, and reset the deadline for that filing to September 25, 2015 (Doc. #54).
4. The parties have been diligently working on the settlement agreement and the motion for preliminary approval in close coordination each other and with non-party (GAP provider) CNA National. Progress has been steady, and the parties (along with CNA) have been in nearly daily

communication in their cooperative efforts to finalize both the Motion for Preliminary Approval and the materials required to support it.

5. Notwithstanding the parties' determination to meet the September 25, 2015 filing deadline, it is now apparent that their readiness projection was overly-optimistic, and that some additional time will be required. Specifically, the parties need additional time to finish compiling the information required to (a) define the *precise* scope of the prospective settlement class, and (b) affirmatively identify all its members for class notice (and other) purposes.

6. Due to the time-intensive nature of this additional work, which also requires the resources of CNA, the parties respectfully request a further extension, up to and including Friday, October 16, 2015, to file their motion for preliminary approval. If granted, the parties do not anticipate the need to seek any additional time.

7. This extension will also require the resetting the current Status Conference date of October 1, 2015.

8. This extension is sought for good cause and not for the purpose of delay.

9. This is the third extension of time requested in relation to this deadline.

10. No party will be prejudiced by this extension of time.

WHEREFORE, for the reasons set forth above, Plaintiff and Defendant respectfully move the Court for an order granting the relief sought herein, and for such further relief the Court deems proper.

Dated: September 25, 2015

Respectfully submitted,

/s/ Joseph A. Kronawitter

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**Attorneys for Defendant Ally Financial,
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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send a notice of electronic filing to all persons registered for ECF as of that date.

/s/ Joseph A. Kronawitter